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Evan A. Showell

March 23, 2012

VIA ECF

Hon. Karen M. Williams  
United States Magistrate Judge  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza  
Camden, N.J. 08101

Re: Stewart v. Beam Global Wine & Spirits, et al., CASE NO.: 1:11-cv-05149 (NLH)  
(KMW)

Dear Magistrate Judge Williams:

We represent Plaintiffs in the above-captioned action. I write to report on the parties' telephonic ESI conference held on March 16, 2012.

At that conference it was agreed that Plaintiffs would supply a list of search terms to defendants as well as requested specifications for the production of ESI by Tuesday, March 20, 2012. Plaintiffs timely supplied the required information. It was further agreed that Defendants would supply a list of proposed custodians for whom ESI searches would be conducted, also by Tuesday, March 20, 2012.

On Thursday evening, March 22, 2012 Defendants supplied a modified list of proposed search terms as well as a list of custodians.

The parties are presently engaged in a meet and confer process regarding the proposed revised list of search terms. I anticipate that Plaintiffs' response to Defendants' modified list of search terms will be served early next week and that the process of identifying and producing ESI can begin immediately thereafter.

No timetable has yet been established for the production of ESI. It is unlikely that Defendants will be able to estimate an appropriate amount of time for producing ESI before an agreed list of search terms has been finalized.

If the proposed timetable for Defendants' production of ESI appears unreasonable, or if the parties are unable to agree on a modified list of search terms, the parties will confer

and, if necessary, contact the Court to request a conference regarding same.

Respectfully submitted,

  
Evan A. Showell

cc via ECF only:

All counsel of record registered to receive ECF notification